

DISTRICT OF MASSACHUSETTS

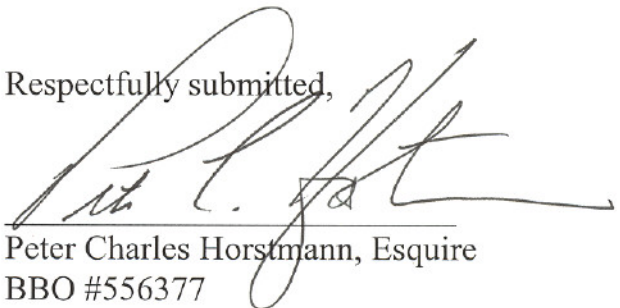
UNITED STATES OF AMERICA )  
)  
v. )  
)  
JOHN CHU (1), )  
ZHU ZHAOXIN (2) and )  
SUNNY BAI (3) )  
\_\_\_\_\_ )

No. 04-CR-10156 WGY

**DEFENDANT ZHU ZHAOXIN'S EX PARTE MOTION**  
**FOR LEAVE TO FILE MOTION UNDER SEAL**

NOW COMES the Defendant, Zhu Zhaoxin, through counsel, and respectfully moves this Honorable Court for leave to file Defendant Zhu Zhaoxin's *Ex Parte* Motion For Appointment of Co-Counsel.

Respectfully submitted,



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